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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ANIMAL WELLNESS ACTION, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	Case No: 3:22-cv-00034-MMD-CLB
<i>v.</i>)	
)	FEDERAL DEFENDANTS' NOTICE
UNITED STATES DEPARTMENT OF THE)	OF COMPLETION OF HERD
INTERIOR, <i>et al.</i> ,)	MANAGEMENT AREA PLAN
)	
<i>Defendants.</i>)	
)	

Defendants United States Department of the Interior, Bureau of Land Management (“BLM”), and Kimberly Prill, in her official capacity as Acting Nevada State Director of the BLM,¹ (“Federal Defendants”), by and through their undersigned counsel, hereby notify the Court that, as of March 4, 2025, the BLM has issued a herd management area plan (“HMAP”) covering the Pancake Complex herd management areas.

This notice is given in accordance with the Court’s March 28, 2024 Order, which “compel[ed] Defendants to prepare and approve HMAP(s) covering the Pancake Complex HMAs within one year of the date of th[e] order.” ECF No. 81 at 28.² A copy of the HMAP is

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Ms. Prill is automatically substituted for Jon Raby, formerly Nevada State Director of the BLM.

² This filing references ECF-generated page numbers.

1 attached as an exhibit to this Notice. *See* Ex. A, Pancake Complex Wild Horse Gather & Herd
2 Management Area Plan (March 4, 2025).

3 Dated: March 21, 2025

Respectfully submitted,

4 ADAM R.F. GUSTAFSON,
5 Acting Assistant Attorney General
6 U.S. Department of Justice
7 Environment & Natural Resources Division
8 S. JAY GOVINDAN, Section Chief
9 BRIDGET K. MCNEIL, Assistant Section Chief

10 /s/ Christian H. Carrara

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2025, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Nevada using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system, which includes counsel of record for all parties in the case.

/s/ Christian H. Carrara
CHRISTIAN H. CARRARA
Attorney for Federal Defendants